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# What to Expect During OSHA's Visit



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## Introduction

Applying to participate in OSHA's Voluntary Protection Programs represents a major commitment of your time and resources to showcase your safety and health program. This publication will help prepare you for the second phase of application—the OSHA onsite visit. The companion workbook, *So You Want to Apply for VPP?*, outlines the elements your application should address.

Completing your application and responding to any OSHA questions about your safety and health program serves as an excellent start to getting ready for the onsite evaluation. When OSHA arrives, you'll be asked to demonstrate further your program's readiness for VPP approval.

OSHA uses a team approach for its VPP evaluations. Team members will include as a minimum three members: a *team leader*, a *safety professional*, and an *industrial hygienist*. On larger sites, or sites with more complex processes, the team usually will include a backup team leader and may include additional personnel. The onsite visit begins with an opening conference, continues with review of your documentation, includes a tour of your site, and involves formal and informal interviews with randomly selected managers, supervisors, and employees. OSHA then prepares its findings in a draft report, including the initial recommendation of the team, and presents the findings at a closing conference.

This guide outlines the specific documentation you will need for the visit and the steps OSHA follows in the onsite review. We hope it will make the process clearer and your preparations easier.

We look forward to welcoming you into the VPP family.

The VPP is a strong component of the "New OSHA's" commitment to partnership with companies that want to do the right thing—improve worker safety and health.



## The Opening Conference

This initial briefing, beginning soon after the OSHA VPP team arrives at the site, usually is led by the OSHA VPP *team leader*. At some work sites, a plant representative opens the conference by welcoming the OSHA team and introducing the attending site representatives. The OSHA VPP team leader introduces the OSHA team and sets the tone for the team's work by defining the scope of the onsite review, clarifying expectations, and explaining the assistance the OSHA review team will need from the site personnel. Sometimes employee representatives will present an overview of the site to orient the OSHA VPP team members. A quick tour of the site for OSHA VPP team members may follow the opening conference.



## The Onsite Review

### **Documentation Review**

The team will review the documentation of all aspects of the safety and health program to determine if the program elements adequately address hazards at the site and if they meet the requirements for one of the voluntary programs. Organization and labeling of these documents will facilitate the team's review process. Examples of documents to be reviewed include the following:

- OSHA 200 injury/illness logs for the past 3 full calendar years and year-to-date, with supporting documents such as workers' compensation first reports of injuries, first-aid logs, and employee medical records. In advance of the onsite visit, the team leader will provide the site with a medical access order. The employer must post this order in an obvious place. The team will review site

logs and site logs for contractors whose employees have worked on the site at least 500 hours a quarter.

- Baseline surveys for safety and health hazards, including all industrial hygiene sampling records and material safety data sheets (MSDSs).
- Evidence of line accountability, such as performance evaluations and bonus systems.
- Hazard analyses, such as change analyses, process hazard reviews, job hazard analyses, and phase hazard analyses.
- Employee reports of safety and health hazards and suggestions, including documented responses.
- Reports of site inspections and accident investigations, including documented responses.
- Preventive maintenance records.
- Emergency procedures, including critiques of drills and documented responses to recommendations for improvement.
- All specialized programs required for compliance with OSHA regulations, such as lockout/tagout, confined spaces, and bloodborne pathogens, to name a few.
- Safety Committee minutes, if applicable, and/or records of other methods of employee involvement.
- Training records, including types of training given, how curriculum is developed and reviewed, how understanding of training is assessed, and how an individual employee's training is documented.
- The annual evaluation of the site's safety and health program, including documented responses to the evaluation's suggestions for improvement.

Team members may request additional documents and records for review. Requests for documents must be properly and clearly communicated to the applicant.

## **Site Tour**

The OSHA VPP team will tour the work site to ensure that the safety and health program is implemented as described in the VPP application and in the documents reviewed at the site and that the program is effective for protecting persons working at the site. The site tour often is referred to as the walkthrough.

## ***Scope***

All members of the OSHA VPP review team will tour the site to understand the operations and to observe working conditions. The team must see enough of the site to understand the hazards that exist and to determine that these hazards are being addressed systematically by the site's safety and health program. Any work performed by contract employees, whether supervised by site management or contractor management, should be included in the site tour.

The *safety reviewer* will:

- Follow the entire work process or operations, where possible.
- Note hazard categories—such as walking/working surfaces, fire safety, hazardous materials storage and handling, storage and handling of general materials, confined space entry, machine guarding, lockout/tagout, electrical equipment, power tools, and welding equipment—for appropriate management and any necessary improvements.
- Note needed improvements and suggest revisions to the corresponding safety and health management system, such as the site inspection, preventive maintenance, and employee reports of hazards.
- Discuss with site escort any hazards found, make descriptive notes of the hazard, and seek agreement with site personnel for time period and verification necessary for correction.

The *industrial hygienist* will:

- Follow the entire process/operation flow of the work site, where possible.
- Check known hazard areas, especially those noted through a review of monitoring records and MSDSs, for possible problems in work practices.
- Look for evidence that these hazards are appropriately controlled, and that no other hazards exist.
- Note areas that need improvement.
- Where improvements are needed in work procedures, suggest program revisions to the corresponding safety and health management system element, such as the respiratory protection program, the industrial hygiene survey procedures, or the hazard communications program.

#### ***Problem Areas***

If repeated hazards have been noted during the document review, or during previous onsite visits, the review team will give special attention to these issues.

#### ***Informal Interviews***

During the site tour, team members will interview randomly selected employees at their work stations. These interviews should include supervisors, maintenance personnel, safety committee members, contract and temporary workers in all areas of the site. Typical questions will address work procedures, emergency procedures, and personal protective equipment. Interviews will be conducted in a manner that avoids disruption of normal operations and that encourages candid conversation.

Contract employees will be included in the interviews to ensure that equally effective protection is provided to all employees involved in the site's operation.

## **Formal Interviews**

At some time other than during the site tour, the team leader will randomly select persons to be interviewed from an employee roster, with the goal of interviewing a cross section of employees, including managers and supervisors. These interviews take place in a private setting and usually last about one-half hour each.

### ***Management***

Interviews with management will provide team members with information about the site's safety and health program and its management oversight system.

### ***Employee***

Employee interviews will help gauge the extent of employee awareness and involvement in the safety and health program.



## **Daily Meetings**

At the end of each day, the OSHA VPP team will meet to discuss their findings and to plan their work for the next day. Following each meeting, the team will meet with site representatives to discuss the day's work and to coordinate plans for the next day.

## **Recommendations**

**Prior to the closing conference**, usually on the last full day of the onsite review, the team will meet to decide what their recommendation will be and to write the first draft of the onsite review report. Criteria for their recommendation will be as follows:

- Safety and health conditions at the site, including hazards found, plans to correct those hazards, and program improvements to prevent recurrence of those hazards.

- Information gathered from employee interviews.
- A successfully implemented safety and health program that meets the requirements for one of the Voluntary Protection Programs.

The team will pay particular attention to consistency—how good the match is—between the description of the safety and health program provided in the application, the documentation provided at the site, the conditions of the site, and the employees' experience with the site's safety and health program.



## Approval Recommendation Options

The team leader will address, with appropriate site personnel, any unresolved issues noted by the team. The team will then choose among the following alternatives:

### Pre-Approval Review

- The applicant has met all the requirements for one of the Voluntary Protection Programs: Star, Merit, or Demonstration.
- The applicant needs to make the changes noted by the OSHA VPP team to meet the VPP requirements.
- The site is ineligible for VPP. The team will request that the site withdraw its application.

### Evaluation Review

- If a team evaluating a Merit site finds all Merit goals have been met, the team will recommend Star participation.
- If good progress is being made toward meeting Merit goals and time remains in the Merit approval period, the team will recommend continuation in the Merit Program.

- If good progress is being made toward meeting Merit goals, but they have not yet been met completely, and the Merit approval period has expired, the team may recommend an extension of this period when extraordinary circumstances exist, such as a change in management or substantial reorganization. Otherwise, the team will recommend that the site withdraw its participation.
- If the team evaluating a Star site finds that most requirements are being met, but that the safety and health program has weakened, the team may recommend a 1-year conditional period with specified goals for strengthening the program within that 1 year.
- If the team evaluating a Star site finds all VPP requirements continue to be met, the team will recommend continuation in the Star Program.
- If the team evaluating a Demonstration site finds the program elements continue to be strongly implemented, the team will recommend continuation in the Demonstration Program.
- If the team is evaluating a Demonstration site and the term of the Demonstration is completed, the team will either recommend that the demonstration has been successful, that the site should be approved to Star, and that the VPP requirements should be changed to reflect that success; **or** recommend that the demonstration has not been successful, and that the site must withdraw from the VPP.
- If the team finds the site's safety and health program to be grossly deficient, the team will recommend that the site withdraw from the VPP.



## **Presentation of Findings and Recommendations**

### **Closing Conference**

Site management and employee representatives will receive a formal briefing, usually called the closing conference, at the conclusion of the onsite review.

### **Team Recommendation**

During the closing conference, the team's recommendation to the Regional Administrator or to the Assistant Secretary of Labor for Occupational Safety and Health will be presented. Note that the team makes a **recommendation**, not an approval decision.

### **Site Review of Findings**

Either during the closing conference or shortly thereafter, the site will be given the opportunity to review the team's findings as presented in the draft report. Attached to this draft report may be a list of 90-day items, which are a description of hazards found that must be corrected within 90 days. Interim measures to protect employees have already been taken. The site may correct any misstatement of fact occurring in this report before the report is submitted to the OSHA Regional Administrator.



## **After the Onsite Visit**

The *team leader* will submit a final draft of the onsite report to the regional *VPP manager*, who will review it, and send it to the Regional Administrator for approval, if the report is an evaluation recommending continuation in the same program.

If the report recommends a new approval or a change in program, such as Merit to Star, the Regional Administrator will add his recommendation for approval and forward the report to the Directorate of Federal-State Operations in Washington, DC.

Then the VPP national office staff will review the report and prepare a letter to the site's Chief Executive Officer (CEO) for the Assistant Secretary of Labor's signature, indicating approval. The Assistant Secretary of Labor also will send an acknowledgment letter to the site CEO when the Regional Administrator has approved continuation in a program. After approval, the regional VPP manager will order the appropriate symbols of approval, such as the certificate, flag, or plaque, and will communicate with the site about the best time for their presentation.